

IN THE UNITED STATES DISTRICT COURT  
FOR THE Northern DISTRICT OF TEXAS  
Lubbock DIVISION

CLERK U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
LUBBOCK DIVISION

2021 AUG 17 AM 9:29

Reno Preston Roberts # 2029343

Plaintiff's Name and ID Number

DEPUTY CLERK Sp

Texas Department of Criminal Justice - John T. Montford unit  
Place of Confinement

5-21 CV 0170-H  
CASE NO. \_\_\_\_\_  
(Clerk will assign the number)

v.

Andrea Lozada 8602 Peach Street Lubbock Texas 79404  
Defendant's Name and Address

David Reed Jr 8602 Peach Street Lubbock Texas 79404  
Defendant's Name and Address

Ricardo Ramirez 8602 Peach Street Lubbock Texas 79404  
Defendant's Name and Address  
(DO NOT USE "ET AL.")

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INSTRUCTIONS - READ CAREFULLY

NOTICE:

**Your complaint is subject to dismissal unless it conforms to these instructions and this form.**

1. To start an action you must file an original and one copy of your complaint with the court. You should keep a copy of the complaint for your own records.
2. Your complaint must be legibly handwritten, in ink, or typewritten. You, the plaintiff, must sign and declare under penalty of perjury that the facts are correct. If you need additional space, **DO NOT USE THE REVERSE SIDE OR BACKSIDE OF ANY PAGE.** ATTACH AN ADDITIONAL BLANK PAGE AND WRITE ON IT.
3. You must file a separate complaint for each claim you have unless the various claims are all related to the same incident or issue or are all against the same defendant, Rule 18, Federal Rules of Civil Procedure. Make a short and plain statement of your claim, Rule 8, Federal Rules of Civil Procedure.
4. When these forms are completed, mail the original and one copy to the clerk of the United States district court for the appropriate district of Texas in the division where one or more named defendants are located, or where the incident giving rise to your claim for relief occurred. If you are confined in the Texas Department of Criminal Justice, Correctional Institutions Division (TDCJ-CID), the list labeled as "VENUE LIST" is posted in your unit law library. It is a list of the Texas prison units indicating the appropriate district court, the division and an address list of the divisional clerks.

II. PLACE OF PRESENT CONFINEMENT: Texas Department of Criminal Justice ID John T. Montford unit

III. EXHAUSTION OF GRIEVANCE PROCEDURES:

Have you exhausted all steps of the institutional grievance procedure? ✓ YES     NO

Attach a copy of your final step of the grievance procedure with the response supplied by the institution.

IV. PARTIES TO THIS SUIT:

A. Name and address of plaintiff: Reno Preston Roberts #2029343 John T. Montford unit 8602  
Reach street Lubbock, Texas 79404

B. Full name of each defendant, his official position, his place of employment, and his full mailing address.

Defendant #1: Anchea Lozada warden Texas Department of Criminal Justice Institutional division  
John T. Montford unit 8602 Reach street Lubbock, Texas 79404

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

was at all times Relevant to this complaint named in official and Individual capacities

Defendant #2: Daniel Reel Jr Assistant warden Texas Department of Criminal Justice Institutional division  
John T. Montford unit 8602 Reach street Lubbock, Texas 79404

Briefly describe the acts(s) or omission(s) of this defendant which you claimed harmed you.

was at all times Relevant to this complaint named in official and Individual capacities

Defendant #3: Ricardo Ramirez major of corrections officer Texas Department of Criminal Justice  
Institutional Division John T. Montford unit 8602 Reach street Lubbock, Texas 79404

Briefly describe the acts(s) or omission(s) of this defendant which you claimed harmed you.

was at all times Relevant to this complaint named in official and Individual Capacities

Defendant #4: Adam ybarra captain of corrections officer Texas Department of Criminal Justice Institutional  
Division John T. Montford unit 8602 Reach street Lubbock, Texas 79404

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

was at all times Relevant to this complaint named in official and Individual capacities

Defendant #5: Ketton Broach Lieutenant of corrections officer Texas Department of Criminal Justice Institutional  
Division John T. Montford unit 8602 Reach street Lubbock, Texas 79404

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

was at all times relevant to this complaint named in official and Individual capacities

## V. STATEMENT OF CLAIM:

State here in a short and plain statement the facts of your case, that is, what happened, where did it happen, when did it happen, and who was involved. Describe how each defendant is involved. You need not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach extra pages if necessary, but remember the complaint must be stated briefly and concisely. IF YOU VIOLATE THIS RULE, THE COURT MAY STRIKE YOUR COMPLAINT.

- 1) This is a civil action pursuant to 42 U.S.C. §1983 *Hudson v. McMillian* 503 U.S. 1 (1992) and *Estelle v. Gamble* 429 U.S. 97 (1976) seeking monetary damages for excessive use of force for injuries inflicted for the very purpose of causing harm, when plaintiff was repeatedly assaulted by the defendants over the course of escalating events. The above named defendants acting under color of the Texas Department of Criminal Justice inflicted cruel and unusual punishment upon plaintiff by initially assaulting plaintiff and then gratuitously beat plaintiff when hands cuffed behind back plaintiff attempted to take a knee in protest in an act to talk to ranking officials. The supervisory defendants are liable pursuant to *Ashcroft v. Iqbal* 556 U.S. 662 (2009) for the deliberate indifference of policymaking officials, which was a substantial cause of the wrong.

## VI. RELIEF:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

For Compensatory damages in an amount to be determined. For punitive damages against the individual defendant in an amount to be determined. For injunctive relief against the custom and practice of inflicting pain to create the illusion of resistance. For injunctive relief against the we protect our own policy. For such other and further relief as this court may deem just and proper.

## VII. GENERAL BACKGROUND INFORMATION:

- A. State, in complete form, all names you have ever used or been known by including any and all aliases.

Reno Preston Roberts, Lil B, Raye Raye, Raylynn Chanel Desert Rose, chaos, County, Rayelynn Roberts

- B. List all TDCJ-CID identification numbers you have ever been assigned and all other state or federal prison or FBI numbers ever assigned to you.

1172050, 1877710, 51119, 2029343, 07917442

## VIII. SANCTIONS:

- A. Have you been sanctioned by any court as a result of any lawsuit you have filed? YES ☒ NO

- B. If your answer is "yes," give the following information for every lawsuit in which sanctions were imposed. (If more than one, use another piece of paper and answer the same questions.)

1. Court that imposed sanctions (if federal, give the district and division): NA

2. Case number: NA

3. Approximate date sanctions were imposed: NA

4. Have the sanctions been lifted or otherwise satisfied? YES ☒ NO

C. Has any court ever warned or notified you that sanctions could be imposed? \_\_\_\_\_ YES ☒ NO

D. If your answer is "yes," give the following information for every lawsuit in which a warning was issued. (If more than one, use another piece of paper and answer the same questions.)

1. Court that issued warning (if federal, give the district and division): NA
2. Case number: NA
3. Approximate date warning was issued: NA

Executed on: 8/8/2021  
DATE

Reno Preston Roberts #2029343

Reno Preston Roberts  
(Signature of Plaintiff)

### PLAINTIFF'S DECLARATIONS

1. I declare under penalty of perjury all facts presented in this complaint and attachments thereto are true and correct.
2. I understand, if I am released or transferred, it is my responsibility to keep the court informed of my current mailing address and failure to do so may result in the dismissal of this lawsuit.
3. I understand I must exhaust all available administrative remedies prior to filing this lawsuit.
4. I understand I am prohibited from bringing an *in forma pauperis* lawsuit if I have brought three or more civil actions or appeals (from a judgment in a civil action) in a court of the United States while incarcerated or detained in any facility, which lawsuits were dismissed on the ground they were frivolous, malicious, or failed to state a claim upon which relief may be granted, unless I am under imminent danger of serious physical injury.
5. I understand even if I am allowed to proceed without prepayment of costs, I am responsible for the entire filing fee and costs assessed by the court, which shall be deducted in accordance with the law from my inmate trust account by my custodian until the filing fee is paid.

Signed this 8<sup>th</sup> day of August, 20 21.  
(Day) (month) (year)

Reno Preston Roberts #2029343

Reno Preston Roberts  
(Signature of Plaintiff)

**WARNING: Plaintiff is advised any false or deliberately misleading information provided in response to the above questions may result in the imposition of sanctions. The sanctions the court may impose include, but are not limited to, monetary sanctions and the dismissal of this action with prejudice.**



Defendant #6: Todd D. Langwell sergeant of corrections officer Texas Department of Criminal Justice Institutional Division John T. Montford unit 8602 Peach Street Lubbock, Texas 79404.  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you: was at all times relevant to this complaint named in official and individual capacities.

Defendant #7: Saajin R. Monnew correctional officer IV Texas Department of Criminal Justice Institutional Division John T. Montford unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you: was at all times relevant to this complaint named in official and individual capacities.

Defendant #8: Jose A. Gutierrez correctional officer IV Texas Department of Criminal Justice Institutional Division John T. Montford unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you: was at all times relevant to this complaint named in official and individual capacities.

Defendant #9: Lorenzo R. Maldonado correctional officer IV Texas Department of Criminal Justice Institutional Division John T. Montford unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you: was at all times relevant to this complaint named in official and individual capacities.

Defendant #10: Amanda L. Garcia correctional officer IV Texas Department of Criminal Justice Institutional Division John T. Montford unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you: was at all times relevant to this complaint named in official and individual capacities.

Defendant #11: Olaniyi O. Amigbo correctional officer IV Texas Department of Criminal Justice Institutional Division John T. Montford unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you: was at all times relevant to this complaint named in official and individual capacities.

Defendant #12: Javier M. Sanchez Jr. correctional officer IV Texas Department of Criminal Justice Institutional Division John T. Montford unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you: was at all times relevant to this complaint named in official and individual capacities.

Defendant #13: Dangelo Green correctional officer IV Texas Department of Criminal Justice Institutional Division John T. Montford unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you: was at all times relevant to this complaint named in official and individual capacities.

Defendant #14: Tabulani J. Reid correctional officer IV Texas Department of Criminal Justice Institutional Division John T. Montford unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you: was at all times relevant to this complaint named in official and individual capacities.

Defendant #15: Darla A. Peace charge nurse Texas Department of Criminal Justice Institutional Division John T. Montford unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you: was at all times relevant to this complaint named in official and individual capacities.

Defendant #16: John Doe 1 Unit Use of Force Coordinator Texas Department of Criminal Justice Institutional Division John T. Montford Unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you:  
was at all times relevant of this complaint named in official and individual capacities.

Defendant #17: John Doe 2 Regional Director over Montford Unit Texas Department of Criminal Justice Institutional Division John T. Montford Unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you:  
was at all times relevant of this complaint named in official and individual capacities.

Defendant #18: John Doe 3 Administrative Monitor Texas Department of Criminal Justice Institutional Division John T. Montford Unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you:  
was at all times relevant of this complaint named in official and individual capacities.

Defendant #19: John Doe 4 Office of Inspector General Texas Department of Criminal Justice Institutional Division John T. Montford Unit 8602 Peach Street Lubbock, Texas 79404  
Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you:  
was at all times relevant of this complaint named in official and individual capacities.

At all times material to this complaint, the aforementioned individual defendants acted toward plaintiff under color of the statutes, rules, guidelines, customs, policies, and usage of the State of Texas.

doing that occurred.

## II. Statement of Jurisdiction

At all times herein mentioned, Plaintiff was an offender incarcerated at the John T. Montford unit 8602 Peach Street, Lubbock, Texas 79404. The Texas Department of Criminal Justice -- Institutional Division (TDCJ-ID) is an agency of the state of Texas, and all correctional officers and ranking officials referred to herein were at all times relevant to this complaint its employees and agents.

## III. Allegations common to all causes of Action.

About May 2021, Plaintiff was housed on A1-Pod, 4 Row, in cell 37 at the Montford Psychiatric unit, where he was on strip cell restriction and constant Direct Observation issued only a mattress and a suicide blanket as a result of psychological illness. About Sunday May 30, 2021 Plaintiff explained to Defendant Olugbemi that plaintiff needed to speak to a ranking official of a sergeant or above. Defendant Olugbemi then relayed the message to the ranking officer that plaintiff needed to speak with them. Shortly after it was relayed to the ranking officers, Defendant Maldonado, Defendant Gutierrez, and Defendant Garcia arrived at plaintiff's cell door and told plaintiff to submit to the application of hand restraints so plaintiff could be pulled out for a rigged up random cell search. When plaintiff was pulled out of cell, plaintiff was then placed into A1-Pod Quiet dayroom #3. Defendants Garcia, Maldonado, and Gutierrez went and conducted the cell search. Once the cell search was conducted, defendants came back into Quiet dayroom #3 and told plaintiff to submit to hand restraints and return back to A1-Pod, 4 Row, 37 cell. Plaintiff stated to the defendants that the dayroom was being jacked because plaintiff needed to speak to ranking officer. Defendants gave another request to plaintiff to submit to hand restraints at which time plaintiff did submit to hand restraints and came out of Quiet dayroom #3. Several minutes later plaintiff attempted to take a seat on the Run in a peaceful protest. Taking control of the run is a common practice of prisoners seeking access to ranking supervisors when staff violate Job duties. TDCJ-ID guidelines required of defendants Garcia, Maldonado, and Gutierrez prior to implementing force that every effort shall be made to anticipate and defuse, in advance, situations that might give rise to conflict, confrontation, and violence see Use of force plan § 119(a)(1) (April 2017).

## IV. Initial Use of Excessive force.

Defendants Maldonado and Gutierrez slammed plaintiff to the ground, while plaintiff was already on the ground restrained in hand restraints Defendant Gutierrez jumped on the back of plaintiff and began to choke plaintiff out while Defendant Garcia called in on the radio Incident Command system mode and requested for A-Response to respond, while plaintiff was still on the ground restrained and being restrained and choked out by Defendant Gutierrez, A-Response arrived at which time Defendant McNew took it upon himself to kick Plaintiff



in the face 7 times that did result in significant injuries. The use of force by Defendant Gutierrez and Defendant McNew was contrary to TDCJ-ID Policy that if an offender takes control of the run no force shall be attempted until a security supervisor and video camera are present. See Use of force plan.

#### V Supervisory Indifference to Excessive uses of force

Several minutes later Defendant Langwell and Defendant Goad entered the area and ordered the plaintiff to calm down and allow the defendants to escort Plaintiff back to plaintiff's cell of assignment. Plaintiff stated on use of force video camera and to Defendant Goad and Langwell that defendants had blatantly assaulted plaintiff and used over excessive force on plaintiff. Showing Defendant Langwell and Goad the injuries plaintiff stated that he needed medical attention due to injuries.

#### VI unlawful TDCJ-ID Policy "we protect our own"

The above named defendants operate under an established policy that requires all career minded TDCJ-ID Personnel to violate prisoners rights when deemed necessary to protect financial resources or look the other way when the policy is implemented against offenders. The established policy is embodied in a well-known slogan "we protect our own" which is often painted on unit walls and stitched into clothing and accessories worn by TDCJ-ID staff. Staff that violate this we protect our own policy are deemed whistle blowers and are targeted for reprimand. Whistle blowers are ostracized and forced to endure unbearable work environments that cause them to quit or be fired for rule violations.

#### VII Deliberate Indifference to medical Treatment.

Defendant Langwell asked plaintiff whether he had any injuries requiring medical treatment. Plaintiff affirmatively stated he had injuries and requested medical treatment. Defendant Langwell ordered Defendant Peace to inspect Plaintiff for injuries. Defendant Peace stated plaintiff had injuries to his face and would be screened once plaintiff calmed down for further injuries.

#### VIII Documentation of Injuries by medical Personnel.

Later that night plaintiff was pulled back out of my cell and plaintiff's injuries were documented and photographed by medical personnel. Plaintiff received 3 sutures to the left eyebrow and the right eye was kicked completely closed shut and remained shut for a whole week.



#### VIV Plaintiff's Injuries and damages

As a direct proximate and reasonably foreseeable consequences of the above mentioned acts and omissions by the defendants plaintiff

1) was denied his constitutional rights and liberties

2) was subject to multiple excessive use of forces

3) was gratuitously beaten

4) suffered excruciating pain

5) suffered injuries to his eyes and eyebrows

6) was placed in fear of his life

7) suffered a disfiguring facial scar



# STEP 1 OFFENDER GRIEVANCE FORM

Offender Name: Reno Preston Roberts Rayelynn Rose TDCJ # 2029343  
 Unit: John T. Montford Unit Housing Assignment: Alpha 4 pod 37 cell  
 Unit where incident occurred: John T. Montford Unit

Grievance #: 2021118206  
 Date Received: JUN 04 2021  
 Date Due: 07-14-2021  
 Grievance Code: 002  
 Investigator ID #: 2317  
 Extension Date: N/A  
 Date Retd to Offender: JUN 29 2021

You must try to resolve your problem with a staff member before you submit a formal complaint. The only exception is when appealing the results of a disciplinary hearing.

Who did you talk to (name, title)? Sergeant Longwell and Lieutenant Good When? Monday May 31, 2021

What was their response? To write a Step 1 grievance

What action was taken? I am writing this step 1 grievance.

State your grievance in the space provided. Please state who, what, when, where and the disciplinary case number if appropriate

I Reno Preston Roberts Texas Department of Criminal Justice Identification number 2029343 also known as Rayelynn Chanel Desert Rose am a Transgender male to female offender. I am prescribed female hormone injections namely depo-Estradiol 3.0mg/0.6ml once weekly on Wednesdays. I am also prescribed male testosterone blockers namely Spironolactone 25mg Tabs 3 Tablets twice daily. I am also issued a Bio Pass through medical. I am writing this step 1 offender grievance form to make a complaint about an unnecessary and excessive use of force that took place on Sunday May 30, 2021. I Reno Preston Roberts also known as Rayelynn Chanel Desert Rose was pulled out of Alpha 4 pod 37 cell on 2nd Night Shift by officers Maldonado and Gutierrez. I was escorted to quiet dayroom #3 and the cell search was completed. My CDO officer was plumbini. I had requested to speak with a Sergeant to make a report about another incident and while I was in Quiet Dayroom #3 I told officer Maldonado and Gutierrez that I wanted to talk to a Ranking officer. I was cuffed up and pulled out of Dayroom #3 to be brought back to my cell Alpha 4 pod 37 cell. I got by the desk and tried to sit down in a peaceful protest and was forced into a spontaneous use of force. I was beat up bad and kicked in my face 7 times as well as choked out until I was asleep before the use of force was initiated. I have clear and visible injuries that resulted in me requiring a completely closed shut black eye (Right) and 3 sutures to my left eyebrow as well as knots and lumps. I was restrained in hand Restraints before and during the use of force and I wasn't resisting once I was taken to the ground. I am in severe pain and this was an excessive use of force. You cannot make up a statement and explain exactly how I received these injuries just by being taken to the ground.

**Action Requested to resolve your Complaint.**

*properly investigate this use of force. I would like to talk to some persons and OIG. Thanks.*

**Offender Signature:** *Reno La Roba Rayelynn Chanel Desert Rose* **Date:** *June 3, 2021*

**Grievance Response:**

Your complaint has been investigated and reviewed. Your allegations have been investigated by the Montford Unit Administration. Their investigation was then forwarded to the Office of the Inspector General. The Office of Inspector General has indicated there was insufficient evidence to open an OIG investigation. This investigation is closed. No further action warranted by this office.

Warden Andrea Lozada

**Signature Authority:**

*Andrea Lozada* **Date:** *JUN 29 2021*  
If you are dissatisfied with the Step 1 response, you may submit a Step 2 (I-128) to the Unit Grievance Investigator within 15 days from the date of the Step 1 response.  
State the reason for appeal on the Step 2 Form.

**Returned because:** \*Resubmit this form when the corrections are made.

- ☐ 1. Grievable time period has expired.
- ☐ 2. Submission in excess of 1 every 7 days. \*
- ☐ 3. Originals not submitted. \*
- ☐ 4. Inappropriate/Excessive attachments. \*
- ☐ 5. No documented attempt at informal resolution. \*
- ☐ 6. No requested relief is stated. \*
- ☐ 7. Malicious use of vulgar, indecent, or physically threatening language. \*
- ☐ 8. The issue presented is not grievable.
- ☐ 9. Redundant, Refer to grievance # \_\_\_\_\_
- ☐ 10. Illegible/Incomprehensible. \*
- ☐ 11. Inappropriate. \*

**UGI Printed Name/Signature:** \_\_\_\_\_

**Application of the screening criteria for this grievance is not expected to adversely affect the offender's health.**

**Medical Signature Authority:** \_\_\_\_\_

**OFFICE USE ONLY**

**Initial Submission** **UGI Initials:** \_\_\_\_\_

**Grievance #:** \_\_\_\_\_

**Screening Criteria Used:** \_\_\_\_\_

**Date Recd from Offender:** \_\_\_\_\_

**Date Returned to Offender:** \_\_\_\_\_

**2<sup>nd</sup> Submission** **UGI Initials:** \_\_\_\_\_

**Grievance #:** \_\_\_\_\_

**Screening Criteria Used:** \_\_\_\_\_

**Date Recd from Offender:** \_\_\_\_\_

**Date Returned to Offender:** \_\_\_\_\_

**3<sup>rd</sup> Submission** **UGI Initials:** \_\_\_\_\_

**Grievance #:** \_\_\_\_\_

**Screening Criteria Used:** \_\_\_\_\_

**Date Recd from Offender:** \_\_\_\_\_

**Date Returned to Offender:** \_\_\_\_\_

**I-127 Back (Revised 11-2010)**

**Appendix F**

JM Received

AUG 02 2021



Texas Department of Criminal Justice

STEP 2

OFFENDER  
GRIEVANCE FORM

OFFICE USE ONLY

Grievance #: 2021118206  
UGI Recd Date: JUL 01 2021  
HQ Recd Date: JUL 06 2021  
Date Due: 8-10-21  
Grievance Code: 003  
Investigator ID#: 10964  
Extension Date: \_\_\_\_\_

Offender Name: Reno Preston Roberts Rayelynn Rose TDCJ # 2029343  
Unit: John T. Montford Unit Housing Assignment: Alpha 1 10 Cell  
Unit where incident occurred: John T. Montford Unit

You must attach the completed Step 1 Grievance that has been signed by the Warden for your Step 2 appeal to be accepted. You may not appeal to Step 2 with a Step 1 that has been returned unprocessed.

Give reason for appeal (Be Specific). I am dissatisfied with the response at Step 1 because...

I Reno Preston Roberts Texas department of criminal Justice Identification number 2029343 also known as Rayelynn Chanel desert Rose am a Transgender male to female offender. I am prescribed female hormone injections namely depo-Estradiol 3.0mg/0.6 ml once weekly on Thursdays. I am also prescribed male testosterone blockers namely spironolactone 25mg Tabs 3 Tablets twice daily. I am also issued a bra pass through medical. I am writing this Step 2 offender grievance form to make a complaint about a Step 1 offender grievance form that I wrote grievance #2021118206 that pertained to an unnecessary and excessive use of force that took place on Sunday May 30, 2021. I was pulled out of my cell for a random cell search that was set up due to me trying to make a complaint about another incident and I was pulled out of Alpha 1 pod 37 cell and placed into Quiet dayroom #13. My cell was searched and I picked the day room and told officer Maldonado and Gutierrez on 2 card nights and I was ordered to cuff up and come out. I refused at which time I was ordered again. I complied I was brought out of the dayroom and tried to sit down in the space in a peaceful protest to be able to speak to a ranking official. I was forced into a spontaneous use of force where I was assaulted and kicked in my face 7 times by officer mcnue. I received 3 stitches in my left eyebrow and I had my right eye kicked completely closed shut. I was violated under the 8th Amendment for cruel and unusual punishment the 14th Amendment for hate crime and discrimination because I am a Transgender. Officer mcnue confessed to multiple people and pictures of my injuries were taken and I was sent to medical to have the stitches placed in. There is no way they can justify my injuries.

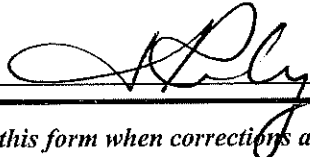


Offender Signature: Renee P. R. Robert Kayelynn Chanel d. Rose Date: June 29, 2021

Grievance Response:

This issue has been reviewed by the Office of Inspector General and that office has determined that there is insufficient evidence to warrant opening a case. No further action will be taken.

Signature Authority:



J. RILEY

Date:

JUL 14 2021

Returned because: \*Resubmit this form when corrections are made.

- ☐ 1. Grievable time period has expired.
- ☐ 2. Illegible/Incomprehensible.\*
- ☐ 3. Originals not submitted. \*
- ☐ 4. Inappropriate/Excessive attachments.\*
- ☐ 5. Malicious use of vulgar, indecent, or physically threatening language.
- ☐ 6. Inappropriate.\*

CGO Staff Signature: \_\_\_\_\_

#### OFFICE USE ONLY

Initial Submission CGO Initials: \_\_\_\_\_

Date UGI Recd: \_\_\_\_\_

Date CGO Recd: \_\_\_\_\_

(check one) ☐ Screened ☐ Improperly Submitted

Comments: \_\_\_\_\_

Date Returned to Offender: \_\_\_\_\_

2<sup>nd</sup> Submission CGO Initials: \_\_\_\_\_

Date UGI Recd: \_\_\_\_\_

Date CGO Recd: \_\_\_\_\_

(check one) ☐ Screened ☐ Improperly Submitted

Comments: \_\_\_\_\_

Date Returned to Offender: \_\_\_\_\_

3<sup>rd</sup> Submission CGO Initials: \_\_\_\_\_

Date UGI Recd: \_\_\_\_\_

Date CGO Recd: \_\_\_\_\_

(check one) ☐ Screened ☐ Improperly Submitted

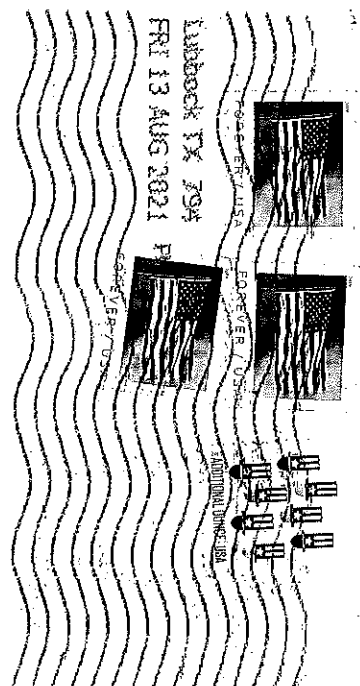
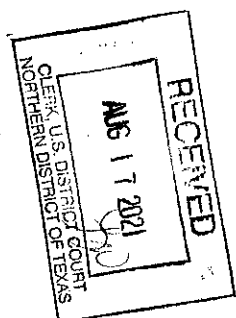
Comments: \_\_\_\_\_

Date Returned to Offender: \_\_\_\_\_

Reno Preston Roberts  
TDCJ ID #2029343  
8602 Peach Ave.  
LUBBOCK, TEXAS 79404

*SPECIAL*

United States District Court  
Northern District of Texas  
Lubbock Division – Clerk's Office  
1205 Texas Avenue, Room 209  
Lubbock, TX 79401 – 4091



Privileged Inmate Mail  
Not to be opened by Texas  
Department of Criminal  
Justice or additional  
Division